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September 14, 1984

*Rec'd 9/17/84
Clarification of the scope
of FOIA-84-487*

Joseph Felton
Director
Division of Rules and Records
Office of Administration
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

RE: Freedom of Information Request
FOIA - 84-487

Dear Mr. Felton:

We are making the following request, which supplements my letter to you dated June 12, 1984, pursuant to the Freedom of Information Act, 5 U.S.C. §552 and the Nuclear Regulatory Commission ("NRC") regulations codified at 10 C.F.R. Parts 2 and 9.

1. Please provide us with copies of all reports, memoranda, transcripts of hearings, correspondence and any other documentation in the custody or control of the NRC that pertain to hearings held by the Atomic Safety & Licensing Board ("ASLB") since January 1, 1984 regarding deficient painting works in the containment buildings at the Comanche Peak Steam Electric Station ("Comanche Peak").

We are especially interested in any information relating to Texas Utilities Generating Co. ("TUGCO"), the licensee, and Brown and Root, Inc., the construction contractor.

2. Please provide us with copies of all reports, memoranda, transcripts of hearings, correspondence and any other documentation in the custody or control of the NRC that pertain to hearings held by the ASLB regarding intimidation of Quality Assurance inspectors by employees of TUGCO or Brown and Root, Inc.

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PDR FOIA
HUGE84-487 PDR

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Joseph Felton
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We are only interested in documents that have been produced or have become available since the issuance of OI Report No. 4-83-013, dated November 3, 1983.

3. Please provide us with copies of the transcripts of the testimony or the statements of the following witnesses, affiants and interviewees whose comments were made during the review of TUGCO's Application for an Operating License (Comanche Peak Steam Electric Station, Units 1 and 2, Docket No.s. 50-445 and 50-446):

- a. Roy Keith Combs
- b. Lester Smith
- c. Freddy Ray Harrell
- d. Gates (first name not known)
- e. Hamilton (first name not known)

The FOIA provides that if only portions of a file are exempted from release, the remainder must be released. We therefore request that we be provided with all nonexempt portions which are reasonably segregable and with an inventory of all exempted portions. We reserve our right to appeal the withholding or deletion of any information.

We are prepared to pay reasonable costs for locating the requested materials and reproducing them. If you have any questions regarding this request, please telephone us at the above number.

As provided in the Freedom of Information Act, we will expect to receive a reply within ten working days.

Sincerely,

ROGOVIN, HUGE & LENZNER

By:

Harry Huge
Harry Huge

cc: Stephen Isaacs
NRC
Information Office

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June 12, 1984

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**FREEDOM OF INFORMATION
ACT REQUEST**

FOIA 84-487
Rec'd 6-13-84

Re: Freedom of Information Request

Dear Mr. Felton:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, and the regulations promulgated thereunder by the Nuclear Regulatory Commission ("NRC") at 10 C.F.R. Parts 2 and 9, we hereby request that you provide us with the following documents:

1. Copies of all records in NRC's files pertaining to any studies, investigations, inquiries (formal or informal) concerning the Comanche Peak Nuclear Power Plant ("Comanche Plant") in Texas as well as any agency documents, internal memoranda, reports, complaints, citations and orders which pertain to the Comanche Plant.

We are primarily interested in any materials related to or concerning construction of the Comanche Plant, by Brown & Root, Inc., including safety conditions, employee relations, work standards, allegations of inferior work, faulty workmanship, deficient work standards, and deficient performance.

2. Copies of all records in NRC's files pertaining to any studies, investigations, inquiries (formal or informal), agency documents, internal memoranda, reports, complaints, citations and orders which pertain to Brown & Root, Inc., a Texas corporation involved in the construction of nuclear power plants.

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Joseph Felton
June 12, 1984
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Please call the undersigned as soon as the documents are available and please notify us if you anticipate that the expense of complying with this request exceeds \$200.00.

Thank you for your cooperation.

Sincerely,

ROGOVIN, HUGE & LENZNER

By: Harry Huge
Harry Huge